



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 20 2002

Ed Legg, Treasurer
Participation 2000 Inc.
236 Massachusetts Avenue, NE, #206
Washington, DC 20002

Identification Number: C00221887

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Mr. Legg:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your committee has completed Section C - FUNDS EXPENDED of Schedule H1 to disclose the ratio as 50% Federal and 50% Non-Federal. However, your committee has also disclosed \$50 as the ACTUAL NON-FEDERAL SHARE and \$0 as the ACTUAL FEDERAL SHARE of the funds expended for direct candidate support. As a result, the federal percentage has been adjusted to reflect 0%. Please be advised, a committee only adjusts the FUNDS EXPENDED ratio to reconcile it with actual disbursements for federal and non-federal candidates made to date. Please amend your report with clarifying information.

-Schedule H4 discloses payments made to credit card companies for shared federal/non-federal operating expenditures. These payments must identify, as memo entries, the original vendors from which you have purchased an item or service regardless of the amount. Please amend your report by providing the name and mailing address of the original vendor(s), along with the date, amount and purpose of each expenditure. 11 CFR §104.10

-On Schedule(s) H4 supporting Line(s) 21(a) of the Detailed Summary Page, you have not included the full name and/or mailing address for several vendors listed. Please amend your report accordingly.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose for several joint expenditures to various vendors. Note that the unique identifying code for an event is not considered an adequate description of purpose. Please amend your report to include this missing information.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): Board, Minicamp, and Misc. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jim Krebs
Reports Analyst
Reports Analysis Division

